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## U.S. Environmental Protection Agency ELECTRONIC SIGNATURE AGREEMENT

In accepting the electronic signature credential issued by the U.S. Environmental Protection Agency (EPA) to sign electronic documents submitted to EPA's Central Data Exchange (CDX), and as a representative for:

### Electronic Signature Holder Company Information

Organization Name:	Clipper Bulk (USA) LLC
Address:	5 Stamford Landing 78 Southfield Avenue
City, State, Zip:	Stamford, CT 06905
Province:	
Country:	US
Phone Number:	(203) 965-7200
E-mail Address:	bulk.opr.stam@clipper-group.com
Registrant's Name:	Ms Rebecca Semsel
CDX User Name:	CLIPPER13

  
(Name of Electronic Signature Holder)

(1) Agree to protect the electronic signature credential, consisting of my Central Data Exchange (CDX) user identification and password, from use by anyone except me. Specifically, I agree to maintain the secrecy of the password; I will not divulge or delegate my user name and password to any other individual; I will not store my password in an unprotected location; and I will not allow my password to be written into computer scripts to achieve automated login.

(2) Agree to contact the U.S. EPA CDX Help Desk at 1-888-890-1995 as soon as possible, but no later than 24 hours, after suspecting or determining that my user name and password have become lost, stolen or otherwise compromised.

(3) I agree to notify CDX within ten working days if my duties change and I no longer need to interact with the CDX on behalf of my organization. I agree to make this notification by notifying the CDX Technical Support staff at 1-888-890-1995 or [helpdesk@epa.gov](mailto:helpdesk@epa.gov).

(4) Understand that I will be informed through my registered electronic mail (e-mail) address whenever my user identification or password have been modified.

(5) Understand that CDX reports the last date my user identification and password were used immediately after successfully logging into CDX.

(6) Understand and agree that I will be held as legally bound, obligated, and responsible for the use of my electronic signature as I would be using my hand-written signature.

(7) Understand that whenever I electronically sign and submit an electronic document to the CDX, I will receive an e mail at my registered e mail address; This e-mail will inform me that a submission has been made to CDX from my user account and will contain instructions to view information regarding the submission, including my Copy of Record (CoR).

(8) Agree that if I receive an e mail notification for any activity that I do not believe that I performed, I will notify the CDX Help Desk as soon as possible, but no later than 24 hours, after receipt.

(9) Agree to contact the CDX Help Desk if I do not receive an e mail notification within 5 business days for any electronically signed submission using my credentials.

(10) Agree to report, within 24 hours of discovery, any evidence of discrepancy between any electronic document I have signed and submitted and what the CDX has received from me by contacting the CDX or service Help Desk.

(11) Agree to notify the EPA if I cease to represent the regulated entity specified above as signatory of that organization's electronic submissions by contacting the CDX Help Desk as soon as this change in relationship occurs and to sign a surrender certification at that time.

(12) Agree to retain a copy of this signed agreement as long as I continue to represent the regulated entity specified above as signatory of the company's electronic submissions.

(13) Certify I have the authority to enter into this Agreement on behalf of the Organization identified above, and I am a signatory authorized to represent that Organization, and I am able to sign and submit reports and other information on behalf of that Organization in the capacity required by statute and/or regulation.


(14) Certify that by signing and submitting this agreement, I have read, understand, and accept the terms and conditions of this electronic signature agreement. I certify under penalty of law that I have personally examined and am familiar with the information submitted in this agreement and I

believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Name of electronic signature holder:

Ms Rebecca Samsel

Signature:

  
\_\_\_\_\_

Date:

8/14/13

  
\_\_\_\_\_

PLEASE SEND THIS DOCUMENT AS SOON AS POSSIBLE TO:

For mailing via USPS :

U.S. Environmental Protection Agency  
Office of Civil Enforcement; Air Enforcement Division  
Marine ECA - Fuel Oil Non-Availability  
1200 Pennsylvania Ave N.W.  
Ariel Rios South Building, Mailcode 2242A  
Washington, D.C. 20460

For non-USPS Couriers:

Cassandra Barnes  
USEPA Headquarters  
Ariel Rios South Building  
1200 Pennsylvania Avenue, N. W.  
Rm # 2111C  
Washington, DC 20004

## North America Emission Control Area Fuel Oil Non-Availability Report				
## ECA0100				
## 1	2	3	4	5
##				
##(Include Double Pound for comments, not form fields)				
##Report Form ID	Ship Operator Name	Vessel Name	Flag Country	IMO ID Number
ECA0100	Clipper Bulk (USA) LLC	M/V Clipper Triton	Panama	9667447

6	7	8	9
Date of ECA First Notice	Location of ECA First Notice	Name of Ports after First Notice	Name of Last Port before ECA Entry
8/19/2013	Lat: 51 24.0N Long: 176 26.0W	Vancouver, B.C.	Imabari Yard, Kudamatsu, Japan

10	11
Name of Port with Fuel Oil Supply Disruption	Name of Original Fuel Supplier with Disruption
n/a	HFO supplied at Kudamatsu shipyard Supplier : JX Nippon Oil & Energy Europe Limited

12

13

14

Number of Fuel Suppliers Contacted

Date of Entry in the ECA      Time of Entry in the ECA

2 - Port of Tokyo, and Kudamatsu, Japan

8/19/2013 16:00 hrs lt

15

16

17

Sulfur Content of Non-Compliant Fuel Oil

Projected Hours on Main Propulsion

Name of First POC

3.17% 48 hours

Vancouver, B.C.

18

19

Compliance Fuel Oil Available at First POC?

Plan to Bunker Compliant Fuel Oil at First POC?

Yes

Yes - stemmed 210 mt LSFO with suppliers  
Marine Petrobulk Ltd.



	20	21	22
Number of fuel suppliers contacted at First POC	Name of Second POC	Compliant Fuel Oil at Second POC?	
one	Manzanillo, Mexico	Yes	

	23	24	25
Plan to Bunker Compliance Fuel Oil at Second POC?	Number of Fuel Suppliers Contacted at the Second POC?	Date of Exit from ECA?	
No will be supplied at 1st POC	n/a	8/21/2013	

26

27

28

Time of Exit from ECA?

Has this vessel operated in the ECA in previous 12 months?

Number of Separate Visits to the ECA

16:00 hrs

no - vessel is a new building delivered ex-yard 8/8/13

zero

	29	30	31
Number of Ports visited in the ECA	Previously submitted ECA0100 forms?	Number of Submitted Reports	
zero	n/a	zero	

32

33

34

Designated Corporate Official Name

Designated Corporate Official E-mail

Designated Corporate Official Phone Number

Clipper Bulk (USA) LLC

bulk.opr.stam@clipper-group.com

(203) 965 -7200

### Description of Actions to Achieve Compliance

Vessel is a newbuilding delivered ex-yard 8/8/13  
No LSFO available at yard and vessel was unfixed  
at the time of delivery. Once the first voyage orders  
were given vessel had already passed all LSFO ports  
in ballast to Vancouver.

# Fuel oil non-availability report

Name of Vessel:	M/V <i>Upper Triton</i>	Flag:	<i>Panama</i>	IMO Number:	<i>9667447</i>
(if other relevant registration # enter here) :					
Provide a description of the vessel's voyage plan in place at the time of entry into the North American ECA (Attach copy of plan if available) :					
Port of Origin:	<i>Imabari, Japan</i>	Date:	<i>8/8/13</i>		
Port of Destination:	<i>Vancouver, B.C.</i>	First US port of Arrival:	<i>Washington - coastal waters</i>		
Date vessel first received notice that it would be transiting in the N. American ECA:					
Vessel's location at the time of notice:					
Date/Time ship operator expects to enter N American ECA:				<i>19 Aug 2013 / 1600 LT</i>	
Date/Time ship operator expects to exit N American ECA:					
Projected days ship's main propulsion engines will be in operation within N American ECA:					<i>2 days</i>
Sulfur content of fuel oil in use when entering and operating in the N American ECA:					<i>3.17%</i>
Provide a description of actions taken to attempt to achieve compliance prior to entering North American ECA, including a description of all attempts that were made to locate alternative sources of compliant fuel oil, and a description of the reason why compliant fuel oil was not available:					
<p><i>Vessel is a new building delivered to yard 8/8/13 - no LSFO available at yard and vessel was unfixed at time of delivery. at the time vessels 1st voyage was fixed - vessel had already passed all LSFO ports in ballast to Vancouver.</i></p>					

## Fuel oil non-availability report

[illegible]

If Applicable
<p>Describe any operation constraints that prevented using available compliant fuel oil (e.g. with respect to viscosity or other fuel oil parameters):</p> <p>none availability at the ports when vessels called. Vessels first employment was only fixed after passing an LSFO bunkering ports.</p>
<p>Specify steps you have taken, or are taking, to resolve these operational constraints that will allow you to use all commercially available residual fuel oil blends:</p> <p>Arranged for a 210 mt LSFO stem to be supplied in Vancouver on arrival.</p>



### Fuel oil non-availability report

Describe availability of compliant fuel oil at the first port-of-call in the United States, and plans to obtain that fuel oil:						
Vessel will be supplied with LSFO 210mt in Vancouver, B.C. on arrival 8/22/13 - vessel will not call any U.S. POA this is for proceeding inbound to Juan de Fuca Strait to Vancouver, B.C.						
If compliant fuel oil is (was) not available at the first port-of-call in the United States, list the lowest sulfur content of available fuel oil(s) or the lowest sulfur content of available fuel oil at the next port-of-call in the United States:						
List below U.S. ports visited in the last 12 months:			If vessel or owner/operator has submitted a Fuel Oil Non-Availability Report to the United States Government in the previous 12 months, list the number of Fuel Oil Non-Availability Reports previously submitted and provide details on the dates and ports visited while using non-compliant fuel oil:			
Name	Date	Did vessel use compliant fuel oil? (yes/no)				
a) N/A vessel is under building			Report	Date	Port	Type of Fuel
b) delivered ex yard 8/8/13			1)			Comments
c)			2)			
d)			3)			
e)			4)			
Ship Master Name:		CAPT. SHYAM S.P. SAMU		Ship Operator Name:		Rebecca Semsel
Legal Agent in the U.S.:				Ship Owner Name:		TRITON NAVIGATION B.V.
Name of designated Corporate Official: MR. SADIPTA PAUL						
Address (Street, City, Country, Postal Code):			STRAWINSKY LAAN 901, AMSTERDAM 1077 XX THE NETHERLANDS		Tel. Num.: + 31 20 575 2653	

I hereby certify under penalty of law that the statements and information made herein are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including possibility of fines and imprisonment pursuant to 18 U.S.C. 1001

Signature	Print Name <u>Rebecca Semsel</u>	Date <u>8/16/13</u>
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